

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 18 C 1968
)	
FENCE CONNECTION, INC.,)	JUDGE CHARLES R. NORGLER, SR.
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, FENCE CONNECTION, INC., an Illinois corporation, in the total amount of \$5,767.84, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,117.00.

On March 26, 2018, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on April 16, 2018. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 2nd day of May 2018:

Mr. Juan Escobar, Registered Agent/President
Fence Connection, Inc.
970 Villa Street
Elgin, IL 60120

/s/ Patrick N. Ryan

Patrick N. Ryan
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